

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

In re

THE COMMONWEALTH OF PUERTO RICO, THE
PUERTO RICO SALES TAX FINANCING
CORPORATION, THE PUERTO RICO HIGHWAYS
AND TRANSPORTATION AUTHORITY, THE
EMPLOYEES RETIREMENT SYSTEM OF THE
GOVERNMENT OF THE COMMONWEALTH OF
PUERTO RICO, THE PUERTO RICO ELECTRIC
POWER AUTHORITY, AND THE PUERTO RICO
PUBLIC BUILDINGS AUTHORITY, THE FINANCIAL
OVERSIGHT AND MANAGEMENT BOARD FOR
PUERTO RICO,

Debtors.¹

PROMESA
TITLE III

No. 17-BK-03283 (LTS)

(Jointly Administered)

**URGENT UNOPPOSED MOTION OF NORTON ROSE FULBRIGHT US LLP,
SPECIAL DEBT FINANCING COUNSEL TO THE PUERTO RICO ELECTRIC
POWER AUTHORITY, TO EXTEND ITS DEADLINE TO FILE A VERIFIED
STATEMENT IN COMPLIANCE WITH REQUIREMENTS UNDER THE PUERTO
RICO RECOVERY ACCURACY IN DISCLOSURES ACT, PUB. L. NO. 117-82**

To The Honorable United States District Court Judge Laura Taylor Swain:

Norton Rose Fulbright US LLP (“NRF”), as special debt financing counsel to the Puerto Rico Electric Power Authority (“PREPA”), in connection with the above-captioned title III cases (the “Title III Cases”), and pursuant to section 315(b) of the *Puerto Rico Oversight, Management,*

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283- LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK- 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17- BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

and Economic Stability Act (“PROMESA”),² respectfully submits this motion (the “Motion”) requesting entry of an order substantially in the form attached hereto as **Exhibit A**, extending the deadline for NRF to file its verified statement (the “Verified Statement”) pursuant to the disclosure requirements set forth in the *Puerto Rico Recovery Accuracy in Disclosures Act*, Pub. L. No. 117-82 (“PRRADA”) and Rule 2014(a) of the Federal Rules of Bankruptcy Procedure and in accordance with this honorable Court’s directive in its *Order Approving List of Material Interested Parties Pursuant to the Puerto Rico Recovery Accuracy in Disclosures Act* (the “Order”) [Docket No. 20467]. In support of this Motion, NRF respectfully states as follows:

BACKGROUND

1. On February 22, 2022, the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”) filed the *Motion of Financial Oversight and Management Board for Puerto Rico Requesting Order Approving Proposed List of Material Interested Parties Pursuant to the Puerto Rico Recovery Accuracy in Disclosures Act* [Docket No. 20194] (the “PRRADA Motion”), seeking Court approval of a list of material interested parties attached thereto as Exhibit A (the “MIP List”) in compliance with this Court’s *Order Concerning Compliance with the Puerto Rico Recovery Accuracy in Disclosures Act* [Docket No. 19980].

2. On March 21, 2022, this Court entered its *Order Regarding Proposed List of Material Interested Parties Pursuant to the Puerto Rico Recovery Accuracy in Disclosures Act* [Docket No. 20419], directing the Oversight Board to expand and resubmit the MIP List so that it includes holders of inactive claims.

3. On March 29, 2022, the Oversight Board filed the *Notice of Amended List of Material Interested Parties Pursuant to Puerto Rico Recovery Accuracy in Disclosures Act*

² PROMESA has been codified in 48 U.S.C. §§ 2101-2241.

[Docket No. 20458], which attached a list of material interested parties with respect to all Title III Debtors as Exhibit A thereto (the “Amended MIP List”). The Amended MIP List separated the material interested parties in separate schedules for each of the Title III Debtors.

4. On March 30, 2022, this Court entered the Order approving the Amended MIP List and directing all professionals included in the Amended MIP List to file the disclosures required under PRRADA by May 16, 2022.

5. NRF has been preparing its Verified Statement in order to comply with PRRADA and this Court’s orders, but needs more time in which to finalize and file the Statement. Accordingly, NRF respectfully requests a short extension until June 30, 2022 in which to finalize and file its Verified Statement.

6. NRF files this Motion with the U.S. Trustee’s consent for the relief requested herein.

7. No prior request for relief sought in this Motion has been made to this or any other court.

RELIEF REQUESTED

WHEREFORE, Norton Rose Fulbright US LLP respectfully requests that this Court enter an order substantially in the form attached hereto as Exhibit A, permitting it to file its Verified Statement by June 30, 2022, and granting all other relief that this Court deems just and proper.

Dated: June 3, 2022
In Los Angeles, California.

/s/ Lawrence A. Bauer
Lawrence A. Bauer
NY Bar No. 1828946
lawrence.bauer@nortonrosefulbright.com

NORTON ROSE FULBRIGHT US LLP
1301 Avenue of the Americas, Room 2813
New York, NY 10019-6022
Tel: (212) 318-3078

*Special Debt Financing Counsel to the Puerto Rico Electric
Power Authority*

And

Dated: June 3, 2022
In San Juan, Puerto Rico.

/s/ Katuska Bolaños Lugo
Katuska Bolaños Lugo
USDC No. 231812
kbolanos@diazvaz.law

DIAZ & VAZQUEZ LAW FIRM, P.S.C.
290 Jesus T. Pinero Ave.
Oriental Tower, Suite 803
San Juan, PR 00918
Tel: (787) 395-7133
Fax: (787) 497-9664

Exhibit A

Proposed Order

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

In re

THE COMMONWEALTH OF PUERTO RICO, THE
PUERTO RICO SALES TAX FINANCING
CORPORATION, THE PUERTO RICO HIGHWAYS
AND TRANSPORTATION AUTHORITY, THE
EMPLOYEES RETIREMENT SYSTEM OF THE
GOVERNMENT OF THE COMMONWEALTH OF
PUERTO RICO, THE PUERTO RICO ELECTRIC
POWER AUTHORITY, AND THE PUERTO RICO
PUBLIC BUILDINGS AUTHORITY, THE FINANCIAL
OVERSIGHT AND MANAGEMENT BOARD FOR
PUERTO RICO,

Debtors.³

PROMESA
TITLE III

No. 17-BK-03283 (LTS)

(Jointly Administered)

**ORDER GRANTING URGENT UNOPPOSED MOTION OF NORTON ROSE FULBRIGHT US
LLP, SPECIAL DEBT FINANCING COUNSEL TO THE PUERTO RICO ELECTRIC POWER
AUTHORITY, TO EXTEND ITS DEADLINE TO FILE A VERIFIED STATEMENT IN
COMPLIANCE WITH REQUIREMENTS UNDER THE PUERTO RICO RECOVERY
ACCURACY IN DISCLOSURES ACT, PUB. L. NO. 117-82**

Upon the *Urgent Unopposed Motion Of Norton Rose Fulbright US LLP, Special Debt
Financing Counsel To The Puerto Rico Electric Power Authority, To Extend Its Deadline To File
A Verified Statement In Compliance With Requirements Under The Puerto Rico Recovery
Accuracy In Disclosures Act, Pub. L. No. 117-82* (the “Motion”); and it appearing that venue is

³ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283- LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK- 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17- BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

proper pursuant to PROMESA section 307(a); and the Court having found that the relief requested in the Motion is in the best interests of the Debtors, their creditors, and other parties in interest, it is **HEREBY ORDERED THAT:**

1. The Motion is granted as set forth herein.
2. The deadline for NRF⁴ to file its verified statement pursuant to the *Order Approving List of Material Interested Parties Pursuant to the Puerto Rico Recovery Accuracy in Disclosures Act* [Docket No. 20467] and the *Puerto Rico Recovery Accuracy in Disclosures Act*, Pub. L. No. 117-82, shall be extended to June 30, 2022.
3. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

SO ORDERED.

Dated: _____, 2022
San Juan, Puerto Rico

LAURA TAYLOR SWAIN
United States District Judge

⁴ Capitalized terms not otherwise defined in this Order shall have the meanings ascribed to them in the Motion.

CERTIFICATE OF SERVICE

I hereby certify that, on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notifications of such filing to all CM/ECF participants in this case.

/s/ Katuska Bolaños Lugo
Katuska Bolaños Lugo